




July 13, 1999

MEMORANDUM

TO: Orville D. Green, Administrator
State Air Quality Program

FROM: Susan J. Richards 
Program Manager
Air Quality Permit Program

SUBJECT: J.R. Simplot Co., Don Siding Facility, Pocatello
(Operating Permit Amendment #077-00006)

PROJECT DESCRIPTION

The J.R. Simplot Company, DON Siding facility (Simplot) utilizes continuous emissions monitoring systems (CEMS) to demonstrate compliance with SO₂ emissions from the #300 and #400 Sulfuric Acid Plants, and NO_x from the Nitric Acid Plant. The CEMS requirements were originally placed in the permit prior to promulgation of the requirements of 40 CFR 60, Appendix F, Quality Assurance Procedures. The Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) has determined that the quality assurance requirements of Appendix F are appropriate for the CEMS installed on the #300 and #400 Sulfuric Acid Plants and the Nitric Acid Plant. In addition, DEQ believes that the original intent of the permit was to require that the accuracy of the CEMS data be in accordance with 40 CFR 60 Appendix B - Performance Specification 2 at all times, not just initially. Therefore, this permitting action is intended to clarify the original intent of the Tier II Operating Permit to require Simplot to perform regular accuracy tests on their CEMS.

DISCUSSION

On March 1, 1999, DEQ requested information pertaining to quality assurance procedures for the CEMS on Simplot's Nitric Acid Plant and the #300 and #400 Sulfuric Acid Plants. The request specifically referenced Relative Accuracy Test Audit (RATA) reports and Cylinder Gas Audit (CGA) reports. On March 19, 1999, DEQ received a response from Simplot stating that the RATAs and CGAs are not required under the operating permit and

questioning the need to submit the requested information. On March 22, 1999, DEQ restated its request and explained the reason for the request. On April 9, 1999, DEQ received Simplot's response which states that the CEMS are not used for compliance demonstrations and, therefore, RATAs are not required. DEQ again requested information on April 21, 1999, regarding 24 hour zero and span drift calibrations for each of the CEMS, as well as other raw data. On April 28, 1999, Simplot requested an extension in time to submit the information requested in DEQ's April 21, 1999 letter. On May 10, 1999 representatives from DEQ and Simplot met via conference call to discuss the reason for the data and DEQ's interpretation that 40 CFR 60 Subpart F requirements apply to the CEMS. At that meeting DEQ informed Simplot that the permit would be amended to clarify the requirements. On May 12, 1999, DEQ granted Simplot a fifteen (15) day extension to submit the requested information. FEES

This facility is a major facility as defined by IDAPA 16.01.01.008.14 (*Rules for the Control of Air Pollution in Idaho*); therefore, registration and registration fees, in accordance with IDAPA 16.01.01.527, are applicable. This amendment will not change the required fee payment.

RECOMMENDATIONS

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that the J.R. Simplot company be issued an amended Tier II Operating Permit #077-00006 for the Don Siding facility. No public comment period is recommended, the stringency of emission limits and monitoring requirements have not been lessened, and no entity has requested a comment period.

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cc: Pocatello Regional Office
Source File (077-00006)
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STATE OF IDAHO
DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Administrator

July 13, 1999

MEMORANDUM

TO: Susan J. Richards
Program Manager
Air Quality Permit Program

FROM: Daniel P. Salgado *DP*
Lead Process Engineering
State Technical Services Office

SUBJECT: ***TIER II OPERATING PERMIT TECHNICAL ANALYSIS***
J.R. Simplot Co., Don Siding Facility, Pocatello
(Operating Permit Amendment)

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.400 (*Rules for the Control of Air Pollution in Idaho*) for issuing Tier II Operating Permits (OP).

PROJECT DESCRIPTION

The J.R. Simplot Company, DON Siding facility (Simplot) utilizes continuous emissions monitoring systems (CEMS) to demonstrate compliance with SO₂ emissions from the #300 and #400 Sulfuric Acid Plants, and NO_x from the Nitric Acid Plant. The CEMS' requirements were originally placed in the permit prior to promulgation of the requirements of 40 CFR 60, Appendix F, Quality Assurance Procedures. Simplot conducted an initial CEMS calibration when the CEMS were first installed on the #300 and #400 Sulfuric Acid Plants and the Nitric Acid plant. Since that time, Simplot has not done RATAs or CGAs to determine the accuracy of their CEMS, although the company has submitted quarterly CEMS reports to DEQ to demonstrate compliance with their permitted emission limits. Some of the reports Simplot has submitted indicate that the permitted emission limits for the #300 and #400 Sulfuric Acid Plants and the Nitric Acid Plant have been exceeded.

40 CFR 60.13 requires that the zero drift and span drift be checked daily, but does not require that Protocol 1 gases be used; therefore, the accuracy of the daily checks is also unknown. A review of the daily checks indicates that the NO_x CEMS for the Nitric Acid Plant goes out of calibration for approximately a week at a time, and the strip chart for the #300 and #400 plants, for the time periods of last year's performance tests, show that the SO₂ readings were all over the place prior to, and after, the test run. A rough comparison of the CEMS data and the Method 8 data for those time periods shows that the CEMS RAs were between 16% and 19%.

Therefore, because the CEMS are used for compliance purposes, (40 CFR 60.13 states "for the purposes of this section, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of this section upon promulgation of performance specifications for continuous monitoring systems under appendix B to this part and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, appendix F to this part, unless otherwise specified in an applicable subpart or by the Administrator."), the data has indicated exceedences of permitted emission limits, and the accuracy of the CEMS is questionable; DEQ has determined that the quality assurance requirements of Appendix F are appropriate for the CEMS installed on the #300 and #400 Sulfuric Acid Plants and the Nitric Acid Plant. In addition, DEQ believes

that the original intent of the permit was to require that the accuracy of the CEMS data be in accordance with 40 CFR 60 Appendix B - Performance Specification 2 at all times, not just initially. Therefore, it is appropriate to clarify the permit to meet that intent.

SUMMARY OF EVENTS

On March 1, 1999, DEQ requested information pertaining to quality assurance procedures for the CEMS on Simplot's Nitric Acid Plant and the #300 and #400 Sulfuric Acid Plants. The request specifically referenced Relative Accuracy Test Audit (RATA) reports and Cylinder Gas Audit (CGA) reports. On March 19, 1999, DEQ received a response from Simplot stating that the RATAs and CGAs are not required under the operating permit, and questioning the need to submit the requested information. On March 22, 1999, DEQ restated its request and explained the reason for the request. On April 9, 1999, DEQ received Simplot's response which states that the CEMS are not used for compliance demonstrations and, therefore, RATAs are not required. DEQ again requested information on April 21, 1999, regarding 24-hour zero and span drift calibrations for each of the CEMS, as well as other raw data. On April 28, 1999, Simplot requested an extension in time to submit the information requested in DEQ's April 21, 1999 letter. On May 10, 1999 representatives from DEQ and Simplot met, via conference call, to discuss the reason for the data, and DEQ's interpretation that 40 CFR 60 Subpart F requirements apply to the CEMS. At that meeting, DEQ informed Simplot that the permit would be amended to clarify the requirements. On May 12, 1999, DEQ granted Simplot a fifteen (15) day extension to submit the requested information.

DISCUSSION

1. Area Classification

J.R. Simplot's Don Siding facility is located in Pocatello, Idaho. Pocatello is located in the Power/Bannock County PM-10 nonattainment area. The area is designated as an attainment or unclassifiable area for all other regulated criteria air pollutants.

2. Facility Classification

This facility is a major facility as defined by IDAPA 16.01.01.006.54 (*Rules*). The facility is a designated facility as defined by IDAPA 16.01.01.006.25. The facility is subject to federal regulation in accordance with 40 CFR 60 Subpart T, 40 CFR 60 Subpart U, 40 CFR 60 Subpart G, and 40 CFR 60 Subpart H. The SIC code defining the facility is 2874, and the facility is classified as A1. The facility is located in AQCR 61 and Zone 12.

3. Regulatory Review

The Department is amending the existing Tier II Operating Permit. The amendment does not change the regulatory status of the facility. The following rules were reviewed for this permitting action:

IDAPA 16.01.01.401.03

Tier II Operating Permits Required By The Department.

The Department has determined that the original intent of the Operating Permit was to utilize the CEMS data for compliance purposes. To ensure the CEMS data is accurate, the facility must calibrate them in accordance with 40 CFR 60 Appendix F.

IDAPA 16.01.01.625

Visible Emissions.

The procedures for determining opacity have been placed in the Rules. The permit was updated to reflect this change.

40 CFR 60.13

Monitoring Requirements

The requirements of section 60.13 apply to CEMS required under all the subparts. 60.13 states that if CEMS are to be used for continuous compliance, the CEMS are also subject to the requirements of Appendix F.

40 CFR 60 Appendix F

Quality Assurance Procedures

As explained above, the Department has determined that the original intent of the Operating Permit was to utilize the CEMS data for compliance purposes. To ensure the CEMS data is accurate, the facility must calibrate them in accordance with 40 CFR 60 Appendix F.

4. Emission Estimates

No allowable emissions limit is changing.

5. Modeling

Because the allowable emissions limits are not changing, modeling is not required.

6. Interbureau Coordination

This document will be routed internally for Title V Operating Permit applicability.

7. AIRS

Because this is a clarification to the permit, no AIRS update is necessary.

9. Fees

This facility is a major facility as defined by IDAPA 16.01.01.008.14 (*Rules*); therefore, registration and registration fees, in accordance with IDAPA 16.01.01.527, are applicable. This amendment will not change the required fee payment.

RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that the J.R. Simplot company be issued an amended Tier II Operating Permit #077-00006 for the Don Siding facility. No public comment period is recommended, the stringency of emission limits and monitoring requirements have not been lessened, and no entity has requested a comment period.

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cc: Pat Rayne, AFS
Pocatello Regional Office
Source File (077-00006)
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